

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Application of

*PHILIPPE MARTINEZ,  
MSR MEDIA SKN LTD*

for an Order Pursuant to 28 U.S.C. § 1782 to  
Conduct Discovery for Use in Foreign Proceedings

Case No. 1:24-mc-00306-RA

**DEFENDANTS CARIBBEAN GALAXY REAL ESTATE CORPORATION,  
GALAXY GROUP, AND YING JIN'S CERTIFICATE OF INTERESTED  
PERSONS AND CORPORATE DISCLOSURE STATEMENT**

Defendants Caribbean Galaxy Real Estate Corporation, Galaxy Group, and Ying Jin (the “Caribbean Galaxy Parties”) hereby disclose the following pursuant to this Court’s interested persons order, and Federal Rule of Civil Procedure 7.1 and Local Rule 7.1.1:

1. Ms. Jin is not a non-governmental corporate party or non-governmental corporation moving to intervene.
2. Caribbean Galaxy Real Estate Corporation is a non-governmental corporation without a parent corporation.
3. Caribbean Galaxy Real Estate Ltd. is a non-governmental corporation. To its knowledge, no publicly held corporation owns 10 percent or more of its shares. Its parent corporation is Caribbean Galaxy Holdings Ltd.
4. The Court’s jurisdiction is not based on 28 U.S.C. § 1332(a).

[Intentionally left blank.]

I hereby certify that, except as disclosed above, I am unaware of any actual or potential conflict of interest affecting the district judge or the magistrate judge assigned to this case, and I will immediately notify the Court in writing or learning of any such conflict.

DATED: New York, New York  
November 20, 2024

Respectfully submitted,

QUINN EMANUEL URQUHART &  
SULLIVAN LLP

/s/ Samuel G. Williamson

Samuel G. Williamson  
51 Madison Avenue, 22nd Floor  
New York, New York 10010  
(212) 849-7000  
samwilliamson@quinnemanuel.com

*Attorney for the Caribbean Galaxy Parties*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 20th day of November, 2024, a true and correct copy of the foregoing document was electronically transmitted to all counsel of record via the CM/ECF system.

*/s/ Samuel G. Williamson*

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Samuel G. Williamson  
51 Madison Avenue, 22nd Floor  
New York, New York 10010  
(212) 849-7000  
samwilliamson@quinnemanuel.com